

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

UNITED STATES OF AMERICA,  
v.  
ZACKARY ELLIS SANDERS,  
Defendant.

Case No. 1:20-cr-00143  
Honorable T.S. Ellis, III  
Trial: Oct. 19, 2021

**MOTION TO SEAL DEFENDANT'S EXPERT NOTICE  
REGARDING DR. FRED S. BERLIN**

Defendant, Zackary Ellis Sanders, by counsel, moves this Honorable Court, pursuant to Local Crim. R. 49 for entry of an Order permitting the entirety of his Rule 16(b)(1)(C) expert notice regarding Dr. Fred S. Berlin to be filed under seal. The grounds for the requested relief are set forth in the non-confidential memorandum filed contemporaneously with this motion.

Respectfully submitted,

/s/  
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**CERTIFICATE OF SERVICE**

I hereby certify that on this 4<sup>th</sup> day of October 2021, the foregoing was served electronically on the counsel of record through the US District Court for the Eastern District of Virginia Electronic Document Filing System (ECF) and the document is available on the ECF system.

*/s/ Jonathan Jeffress*  
Jonathan Jeffress